

1 THAD A. DAVIS (SBN 220503)
2 thad.davis@ropesgray.com
3 ROCKY C. TSAI (SBN 221452)
4 rocky.tsai@ropesgray.com
5 ROPES & GRAY LLP
6 Three Embarcadero Center, Ste 300
7 San Francisco, California 94111-4006
8 Tel: (415) 315- 6300
9 Fax: (415) 315-6350

10 HARVEY J. WOLKOFF (Subject to admission *pro hac vice*)
11 harvey.wolkoff@ropesgray.com
12 MARK P. SZPAK
13 mark.szpak@ropesgray.com
14 LARA A. ORAVEC
15 lara.oravec@ropesgray.com
16 ROPES & GRAY LLP
17 Prudential Tower, 800 Boylston Street
18 Boston, MA 02199-3600
19 Tel: (617) 951-7606
20 Fax: (617) 235-0215

21 Attorneys for Defendants

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FRANK TURANO, on Behalf of Himself and All
Others Similarly Situated,

Plaintiff,

v.

SONY CORPORATION OF AMERICA, SONY COMPUTER ENTERTAINMENT AMERICA, INC., SONY COMPUTER ENTERTAINMENT AMERICA LLC, and SONY NETWORK ENTERTAINMENT AMERICA, INC..

Defendants.

Case No. 4:11-cv-02206-SC

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT**

Judge: Hon. Samuel Conti

27 WHEREAS, defendants Sony Corporation of America ("SCA"), Sony Computer

28 Entertainment America LLC (“SCEA”) (f/k/a Sony Computer Entertainment America, Inc.) and
STIPULATION TO EXTEND TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT
26709346_1.DOC CASE NO. 4:11-cv-02206-SC

1 Sony Network Entertainment America, Inc. (“SNEA”), as well as certain related entities
2 (collectively, the “Sony Defendants”), have been named as defendants in at least twenty-five (25)
3 putative class action lawsuits within this District, to date;

4 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
5 least nineteen (19) putative class action lawsuits pending outside this District, to date;

6 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
7 Litigation (the “JPML”) to centralize this and other matters, to which one response has been filed
8 to date, and as to which other responses, including Sony Defendants’ response, are due by June 2,
9 2011;

10 WHEREAS, the current deadline for SCEA and SNEA respond to the Complaint is
11 June 1, 2011;

12 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
13 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
14 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
15 JPML;

16 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
17 by and through their respective counsel, hereby stipulate as follows:

18 The deadline for the defendants to respond to the Complaint in the above-captioned action
19 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
20 litigation centralizing the above-captioned action with other matters, or if centralization is denied
21 by the JPML, then 30 days from the date of such order denying centralization.

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1 Either party may seek ex parte relief from this stipulated Order for good cause shown,
2 including, but not limited to, Defendants' filing of a responsive pleading in a related case.

3 Dated: May 24, 2011

4 JEFF S. WESTERMAN
5 DAVID E. AZAR
6 MILBERG LLP

7 By: /s/ David E. Azar /s/ [as authorized]
8 David E. Azar
9 Attorneys for Plaintiff
10 FRANK TURANO

11 Dated: May 24, 2011

12 HARVEY WOLKOFF
13 THAD A. DAVIS
14 ROCKY C. TSAI
15 ROPES & GRAY LLP

16 By: /s/ Rocky C. Tsai /s/
17 Rocky C. Tsai

18 Attorneys for Defendants
19 SONY CORPORATION OF AMERICA,
20 SONY COMPUTER
21 ENTERTAINMENT AMERICA LLC,
22 and SONY NETWORK
23 ENTERTAINMENT AMERICA, INC.

24 **[PROPOSED] ORDER**

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26 Dated: May 26, 2011

27 By:

